

EPA Region 5 Records Ctr.



273089

Briefing Memo
Bronson Specialties, Inc.
Bronson

- I. Existing NPDES Permit No. MI0037761
- II. Date of Expiration of Existing Permit: January 31, 1981
- III. Date of Re-application: acknowledged March 21, 1980
- IV. Description of Enterprise:

Bronson Specialties, Inc. consists of three divisions: 1. Plastics, 2. Products, and 3. Tool. Plastic gasoline tanks for the automotive industry and plastic sump inserts are blown or injection molded at the Plastics Division. Precision nuts and bolts are manufactured at the Products Division. At the Tool Division, large ~~eyes~~ *dies* and molds are manufactured. There is no wastewater discharge (other than sanitary water) from the Tool Division. There are wastewater discharges from the Plastics and Products Division to the city storm sewer. These divisions are in separate buildings that are ^{located} ~~placed~~ across the street from each other. Since the buildings are located next to each other and are under the same management and discharge to the same storm sewer, the Plastics and Products Divisions will be covered under one permit.

V. Water Usage and Wastewater Disposal:

All water used in the two plants is obtained from the City of Bronson municipal supply. No treatment is provided or additives used in this water. Domestic wastewaters are discharged to the Bronson sanitary sewer system.

Water used for noncontact cooling of plastic molding machines (at the Plastics Division) is discharged through outfalls 001 and 002 to the city storm sewer.

Noncontact cooling water from an air compressor (at the Products Division) is discharged through outfall 003 to the city storm sewer. Water used for rinsing off metal parts after deburring (at the Products Division) is discharged through outfall

PUBLIC NOTICE

Michigan Water Resources Commission
Stevens T. Mason Building
Lansing, Michigan 48909
517-373-2033

Permit Number:
MI 0037761

NOTICE: Application for National Pollutant Discharge Elimination System (Public Law 92-500) Permit by Bronson Specialties, Inc., Bronson Michigan, to discharge noncontact cooling water and process wastewater to Swan Creek via storm sewer and County Drain #30.

Bronson Specialties, Inc.

has applied for reissuance of its National Pollutant Discharge Elimination System (NPDES) Permit to discharge noncontact cooling water and process wastewater into the waters of the State of Michigan. The permit will be issued by the Michigan Water Resources Commission.

The applicant is engaged in the ~~manufacture of~~ plastic blow molding, tool and die ch. ing, and precision screw machining. The applicant discharges its effluent to Swan Creek via storm sewer and County Drain #30.

On the basis of preliminary staff review and application of applicable standards and regulations, the Michigan Water Resources Commission proposes to issue a permit for the discharge subject to certain effluent limitations and special conditions. The permit expiration date is January 31, 1986.

The proposed determination to issue an NPDES Permit is tentative. Persons wishing to comment upon, or object to, the proposed determination are invited to submit the same in writing to:

Engineering & Technical Services Section
Water Quality Division
Dept. of Natural Resources
Box 30028
Lansing, Michigan 48909

The permit application number should appear next to the above address on the envelope and the first page of any submitted comments. All comments received within thirty (30) days of the date of issuance of this public notice will be considered in the formulation of the final determinations. If no written objections are received, the Michigan Water Resources Commission will issue its final determinations no later than sixty (60) days following the date of this notice.

The application, proposed permit including proposed effluent limitations and special conditions, comments received, and other information, are on file and may be inspected at the Water Quality Division Offices, 8th Floor, Stevens T. Mason Building, Lansing, Michigan and at the District Office located at 7150 Harris Dr., General Office Bldg. State Secondary Complex, Dimondale, Michigan Phone 517-322-1687 at any time between 9:30 a.m. and 3:30 p.m., Monday through Friday. Copies of the Public Notice and corresponding Fact Sheet summarizing application information and proposed permit conditions are available at no charge. Copies of all other information are available at a cost of 5¢ per page.

Please bring the foregoing to the attention of persons whom you know would be interested in this matter.

004 to the storm sewer. In the deburring operation, water and Gravi-flow additives FGC-164 and FGC-173 are used. These get carried over into the rinsing off operation and thus discharged through outfall 004. This discharge will be on an intermittent basis, occurring only after each batch of parts is run through the deburring operation.

VI. Receiving Stream: Swan Creek via storm sewer and County Drain #30.

Drought flow (7 day, 10 year) of Swan Creek = 1 cfs.

VII. Critical Materials: none used or discharged

VIII. Proposed Permit Limitations:

Outfalls 001, 002, 003: weekly flow measurement - daily outfall observation.

Outfall 004: Oil and grease - 10 mg/l (staff guidelines).
Suspended Solids - 20 mg/l average, 30 mg/l maximum (staff guidelines)
Total Phosphorus - 2 mg/l (staff guidelines)
pH - 6.0 - 9.0 (BAT)

Total phosphorus and pH limits can be met presently. Suspended solids and oil limits will take effect at end of compliance schedule. Oil and Grease sampling and limits removed from outfall 001. This parameter has not been exceeded 1979-1980. Noncontact nature of the cooling water in 001, 002, and 003 minimize the possibility of significant amounts of oil being discharged. Daily outfall observation should catch any oil or grease finding its way into the discharge.

IX. Special Conditions: Demonstration that use of additives in deburring operations discharged through outfall 004 do not pose unacceptable risks to aquatic populations.

X. Compliance History: Have been in compliance with permit limits for outfall 001 1979-1980. Outfalls 002, 003, and 004 were not previously permitted.

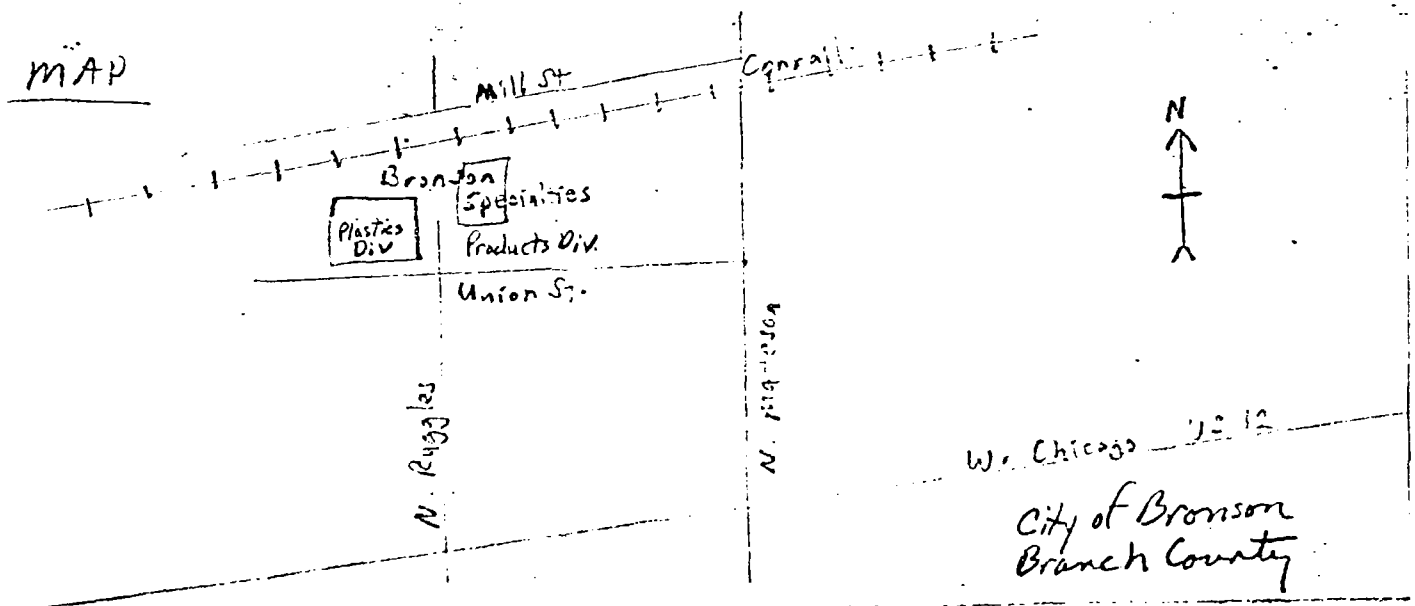
XI. Duration of Permit: The proposed permit will expire on January 31, 1986. An environmental impact statement is not necessary. Staff has determined that the effluent limitations meet appropriate guidelines and are adequate to assure compliance with water quality standards.

FACT SHEET

Swan Creek is classified for recreation - partial body contact; fish, wildlife, and aquatic life - intolerant fish, warm-water species; agriculture; commercial; water supply - industrial; and other uses. A more complete description of the discharges and a sketch of their location follows below:

Description of Existing Discharge

<u>CONSTITUENTS</u>	<u>MINIMUM</u>	<u>AVERAGE</u>	<u>MAXIMUM</u>
<u>001</u> - noncontact cooling water to Swan Creek via storm sewer and County Drain #30			
Flow (MGD)*	0.20	0.46	0.64
Oil and Grease* (mg/l)	4.0	7.0	9.7
*from 1980 monthly operating report data			
<u>002</u> - noncontact cooling water to Swan Creek via storm sewer and County Drain #30			
Flow (MGD)		0.06	0.07
<u>003</u> - noncontact cooling water to Swan Creek via storm sewer and County Drain #30			
Flow (MGD)		0.002	0.004
<u>004</u> - process wastewater to Swan Creek via storm sewer and County Drain #30			
Flow (MGD)		0.0012	0.0014
Oil and Grease (mg/l)		125	
Suspended Solids (mg/l)		225	
Total Phosphorus (mg/l)		1.69	



FACT SHEET

Proposed Determinations

The Water Quality Division has examined the above application. The effluent limitations contained in the proposed permit are based upon application of guidance materials reflecting "best practicable control technology currently available" and the State of Michigan Water Quality Standards, whichever is more restrictive. The Michigan Water Resources Commission proposes to issue the applicant a permit to discharge subject to effluent limitations and certain other conditions. The following is a brief description of the proposed effluent limitations and special conditions:

1. Proposed Limitations - *Outfall 004*

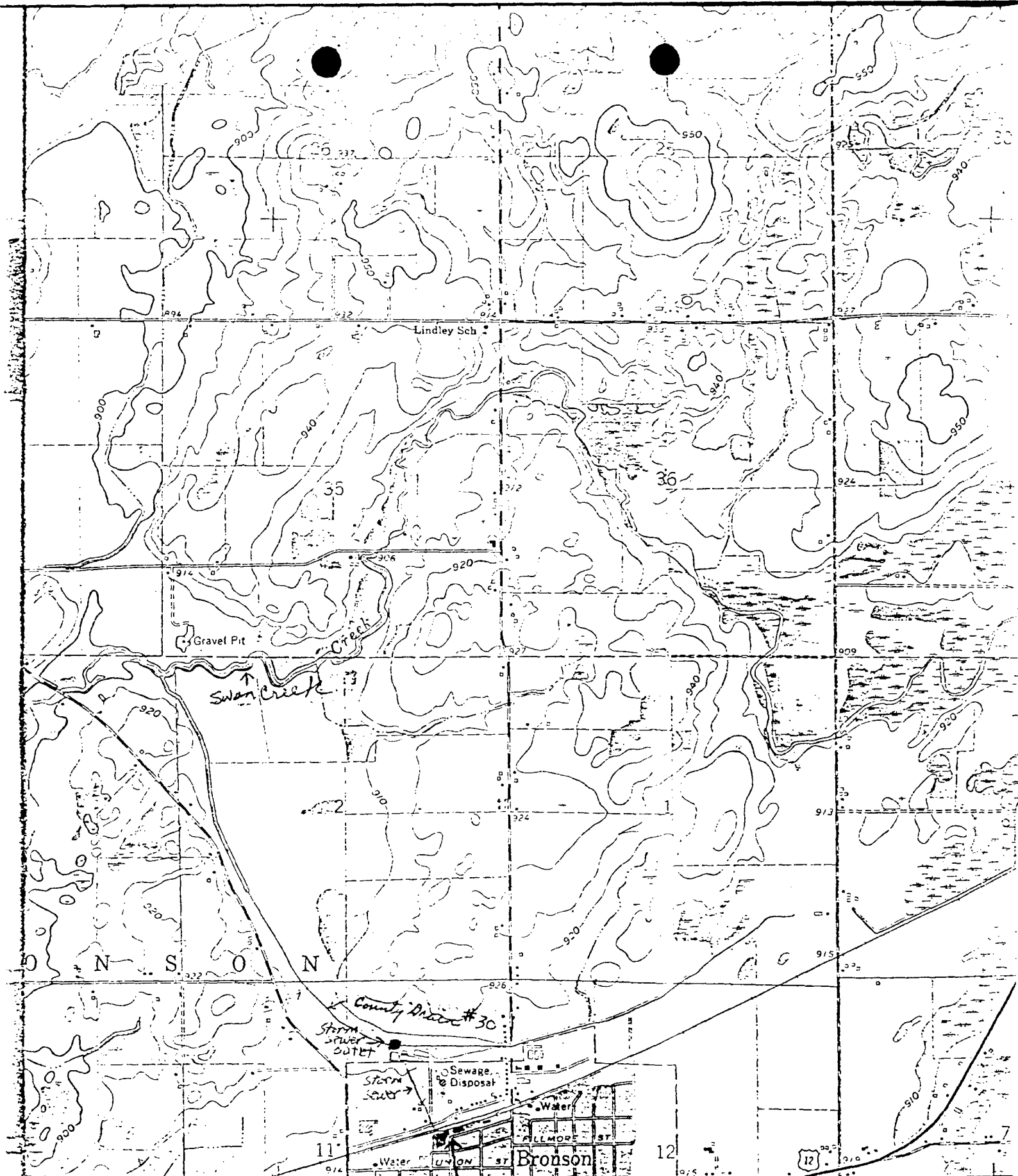
<u>CONSTITUENTS</u>	<u>MINIMUM</u>	<u>AVERAGE</u>	<u>MAXIMUM</u>
pH	6.0	-	9.0
Total Phosphorus (mg/l)			2
Oil & Grease (mg/l)			10
Suspended Solids (mg/l)		20	30

2. Proposed Special Conditions

The company shall continue to meet the limitations of the permit. Monitoring of essential parameters with monthly reporting are specified in the permit. The permit expiration date is January 31, 1986.

Register of Interested Persons

Any person interested in a particular application or group of applications, may leave his name, address, and phone number as part of the file for an application. The list of names will be maintained as a means for persons with an interest in an application to contact others with similar interests.



BRONSON SPECIALTIES
PLASTICS AND PRODUCTS
DIVISIONS

SCALE 1:24,000

BRONSON (P.O.) 0.8 MI.
STURGIS 14 MI.

CONTOUR INTERVAL 10 FEET

Public Hearing

If submitted comments indicate a significant public interest in the application or if useful information may be produced thereby, the Michigan Water Resources Commission at its discretion, may hold a public hearing on the application. Any person may request the Michigan Water Resources Commission to hold a public hearing on the application.

Public notice of a hearing will be circulated at least thirty (30) days in advance of hearings. The hearing will be held in the vicinity of the discharge. Thereafter, the Michigan Water Resources Commission will formulate its final determinations within sixty (60) days. Further information regarding the conduct and nature of public hearings concerning discharge permits may be obtained by writing or visiting the address shown on the Public Notice.

MICHIGAN WATER RESOURCES COMMISSION
 AUTHORIZATION TO DISCHARGE UNDER THE
 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et seq; the "Act"), and the Michigan Water Resources Commission Act, as amended, (Act 245, Public Acts of 1929, as amended, the "Michigan Act"),

Bronson Specialties Inc.

404 Union St.

Bronson MI 49028

is authorized to discharge from a facility located at

same

to receiving waters named *Swan Creek via storm sewer and County Drain #30*

in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts I and II hereof.

This permit shall become effective on the date of issuance.

This permit and the authorization to discharge shall expire at midnight, Jan. 31, 1984. In order to receive authorization to discharge beyond the date of expiration, the permittee shall submit such information and forms as are required by the Michigan Water Resources Commission no later than 180 days prior to the date of expiration.

This permit is based on the company's application numbered _____, dated _____, and shall supersede any and all Orders of Determination, Stipulation, or Final Orders of Determination previously adopted by the Michigan Water Resources Commission.

Issued this _____ day of _____, for the Michigan Water Resources Commission, superseding NPDES Permit No. MI 0037761 expiring 1/31/84.

 Robert J. Courchaine
 Executive Secretary

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. Final Effluent Limitations

During the period beginning the effective date of this permit and lasting until the expiration date, the permittee is authorized to discharge noncontact cooling water from outfalls 001, 002, and 003 to Swan Creek via storm sewer and County Drain #30 ~~(from) (thru) outfall(s) to~~

Such discharge shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitations				Monitoring Requirements	
	kg/day	(lbs/day)	Other Limitations		Measurement	Sample
	Daily Average	Daily Maximum	Daily Average	Daily Maximum	Frequency	Type
Flow, M ³ /day (MGD)					Weekly	
Outfall Observation*					Daily	Visual

*Any unusual characteristics of the discharge which would not be expected from noncontact cooling water (i.e. turbidity, discoloration, oil film, suspended matter, etc.) shall be reported immediately to the district office of the Water Quality Division, followed with a written report within 5 days detailing the findings of the investigation and the steps taken to correct the condition.

The term noncontact cooling water shall mean water used for cooling which does not come into direct contact with any raw material, intermediate product, by product, waste product, or finished product.

a. The pH shall not be less than 7.0 nor greater than 10.0. The pH shall be monitored as follows: at outfalls 001, 002, 003 prior to discharge to storm sewer

a. b. The discharge shall not cause excessive foam in the receiving waters. The discharge shall be essentially free of floating and settleable solids.

b. c. The discharge shall not contain oil or other substances in amounts sufficient to create a visible film or sheen on the receiving waters.

c. d. Samples taken in compliance with the monitoring requirements above shall be taken at outfalls 001, 002, 003 prior to discharge to storm sewer.

d. e. In the event the permittee shall require the use of water treatment additives, the permittee shall notify the Michigan Water Resources Commission in accordance with the requirements of Part II, Section A-1.

e. Authorized daily maximum flows for each outfall are as follows: 001 - six hundred forty thousand (640,000) gallons per day; 002 - seven thousand (70,000) gallons per day;

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. Final Effluent Limitations

During the period beginning the effective date of this permit and lasting until the expiration date, the permittee is authorized to discharge a maximum of one thousand four hundred (1400) gallons per day of rinsewater from a deburring operation (from) (the) outfall(s) 004 to Swan Creek via storm sewer and County Drain # 30. Such discharge shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitations				Monitoring Requirements	
	kg/day	(lbs/day)	Other Limitations		Measurement	Sample
	Daily Average	Daily Maximum	Daily Average	Daily Maximum	Frequency	Type
Flow (MGD)					weekly	
Oil and Grease					weekly	grab
Through Dec 31, 1981						
After Dec 31, 1981			10 mg/l		"	"
Suspended Solids					"	"
Through Dec. 31, 1981						
After Dec. 31, 1981			20 mg/l	30 mg/l	"	"
Total Phosphorus				2 mg/l	"	grab

This document paid for with State funds

a. The pH shall not be less than 6.0 nor greater than 9.0. The pH shall be monitored as follows: once per week grab sample.

b. The discharge shall not cause excessive foam in the receiving waters. The discharge shall be essentially free of floating and settleable solids.

c. The discharge shall not contain oil or other substances in amounts sufficient to create a visible film or sheen on the receiving waters.

d. Samples taken in compliance with the monitoring requirements above shall be taken at outfall 004 prior to mixing with noncontact cooling water and stormwater, and prior to discharge to storm sewer.

e. The discharge is to be managed consistent with instructions provided by the District Engineer, representing the Division Chief, who shall be given notice at least 10 days prior to the discharge. This notice is to include a description of the water quality in the lagoon scheduled to be discharged.

3. Special Condition: water additive usage without available acute toxicity data

The authorization to continue to use Gravi-flow FGC-164 and FGC-173

beyond Dec. 31, 1981 will require the permittee to submit to the Chief of the Water Quality Division the acute toxicity test data for the above mentioned water additive(s). The permittee shall also determine the concentration of the above mentioned water additive(s) in the discharge by analyses or if an approved analytical technique is not available by calculations based on the mass balance through the system. This data shall be submitted in accordance with Part I C-2 Schedule of Compliance.

The Chief of the Water Quality Division will review the submittal and determine appropriate water quality based effluent limitations necessary to assure that the Michigan Water Quality Standards are not violated.

If the water additive concentration(s) as currently used (do) (~~does~~) not exceed the water quality based effluent limitation(s) determined by the Chief of the Water Quality Division, the permittee will be authorized to continue the use of Gravi-flow FGC-164 and FGC-173

at the level(s) specified in the application.

If it is determined by the Chief of the Water Quality Division that the concentration(s) of the water additive(s) in the discharge exceed(s) the water quality based effluent limitation(s) the permittee will be so notified and the permittee shall achieve compliance with the effluent limitation(s) in accordance with Part I C-2 Schedule of Compliance.

4. Special Conditions

"This permit may be modified, or, alternatively, revoked and reissued, to comply with any applicable effluent limitation issued pursuant to the order the United States District Court for the District of Columbia issued on June 8, 1976, in Natural Resources Defense Council, Inc. et. al. v. Russell E. Train, 8 ERC 2120 (D.D.C. 1976), if the effluent limitations so issued:

- (1) is different in conditions or more stringent than any effluent limitation in the permit; or
- (2) controls any pollutant not limited in the permit."

PART I

B. MONITORING AND REPORTING

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge.

2. Reporting

The permittee shall submit monitoring reports containing results obtained during the previous month. The reports shall be postmarked no later than the 10th day of the month following each completed report period. The first report shall be submitted within 90 days of the date of issuance of this permit.

3. Definitions

a. The monthly average discharge is defined as the total discharge by weight, or concentration if specified, during the reporting month divided by the number of days in the reporting month that the discharges from the production or commercial facility occurred. When less than daily sampling occurs, the monthly average discharge shall be determined by the summation of the measured daily discharges by weight, or concentration if specified, divided by the number of days during the reporting month when the samples were collected, analysed and reported.

b. The daily maximum discharge means the total discharge by weight, or concentration if specified, during any calendar day.

c. The Regional Administrator is defined as the Region V Administrator, U.S. EPA, located at 230 South Dearborn, 13th Floor, Chicago, Illinois 60604.

d. The Michigan Water Resources Commission is located in the Stevens T. Mason Building. The mailing address is Box 30028, Lansing, Michigan 48909.

4. Test Procedures

Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(h) of the Act, under which such procedures may be required.

5. Recording Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- a. The exact place, date, and time of sampling;
- b. The dates the analyses were performed;
- c. The person(s) who performed the analyses;
- d. The analytical techniques or methods used; and
- e. The results of all required analyses.

74003276

6. Additional Monitoring by Permittee

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required in the Monthly Operating Report. Such increased frequency shall also be indicated.

7. Records Retention

All records and information resulting from the monitoring activities required by this permit including all records of analyses performed and calibration and maintenance of instrumentation and recordings from continuous monitoring instrumentation shall be retained for a minimum of three (3) years, or longer if requested by the Regional Administrator or the Michigan Water Resources Commission.

C. SCHEDULE OF COMPLIANCE

1. The permittee shall achieve compliance with the effluent limitations specified for outfall ~~(3)~~ 004 in accordance with the following schedule:

- a. Submit progress report to the Chief of the Water Quality Division on or before N.A..
- b. Submit a preliminary engineering report and basis of design for said facilities to the Chief of the Water Quality Division and obtain his approval thereof on or before Sept. 1 1971.
- c. Submit progress report to the Chief of the Water Quality Division on or before N.A..
- d. Submit final plans and specifications for said facilities to the Chief of the Water Quality Division and obtain his approval thereof on or before Oct. 1 1971.
- e. Commence construction of said facilities on or before Nov. 1 1971.
- f. Submit progress report to the Chief of the Water Quality Division on or before N.A..
- g. Complete construction of said facilities on or before Dec. 1 1971.
- h. Attain operational level necessary to meet the limitations specified herein on or before Dec. 31 1971.

6. Additional Monitoring by Permittee

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required in the Monthly Operating Report. Such increased frequency shall also be indicated.

7. Records Retention

All records and information resulting from the monitoring activities required by this permit including all records of analyses performed and calibration and maintenance of instrumentation and recordings from continuous monitoring instrumentation shall be retained for a minimum of three (3) years, or longer if requested by the Regional Administrator or the Michigan Water Resources Commission.

C. SCHEDULE OF COMPLIANCE

1. The permittee shall continue to operate the installed facilities to achieve the effluent limitations specified for outfall(s) _____.

2. The permittee shall comply with the pH limitations in Part _____ in accordance with the following schedule.

a. Submit final plans and specifications for said facilities to the Chief of the Water Quality Division and obtain his approval thereof on or before _____.

b. Complete construction of said facilities on or before _____.

c. Attain operational level necessary to meet the limitations specified herein on or before _____.

3. The permittee shall comply with the requirements of Section 10, Part II-A in accordance with the following:

a. Submit plans for approval to the Chief of the Water Quality Division necessary to comply with the primary power provision of Section 10 in Part II on or before 10/1/81.

b. The permittee shall comply with the requirements of items 10a or 10b contained in Part II on or before 12/31/81.
Notwithstanding the preceding sentence the permittee shall at all times halt, reduce, or otherwise control production in order to protect the waters of the State of Michigan upon the reduction or loss of the primary source of power.

4. No later than 14 calendar days following a date identified in the above schedule of compliance, the permittee shall submit either a report of progress or, in the case of specific actions being required by identified dates, a written notice of compliance or noncompliance. In the latter case, the notice shall include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirement.

2. The permittee shall achieve compliance with the water additive special condition of Part I A-3 in accordance with the following schedule. All submittals shall be to the Chief of the Water Quality Division.

- a. On or before Sept. 1, 1981 submit and receive approval of preliminary plans for obtaining the acute toxicity data.
- b. On or before Oct. 1, 1981 submit and receive approval of final plans for obtaining the acute toxicity data.
- c. On or before Dec. 31, 1981 the acute toxicity data and results of the discharge analyses or the mass balance data for the water additives shall be submitted.
- d. The permittee shall comply with the water quality based effluent limitation(s) 3 months after notification that their effluent water additive concentration(s) exceed the water quality based effluent limitation(s).

Wardson plantation
407 Union St
Bronson, Mich. 49028

Local Unit of Government

City of Bronson

County Drain Commissioner

Branch County

Adjacent Property Owners

Regina Herman
415 N. Ringler

Al Cockrell
351 N. Ringler

Virgil Will
239 State

Local County Health Department

Branch/Hillsdale/St. Joseph

Rodney Nodde
233 State

Newspaper(s)

Appropriate Planning Agency

Region IV

General Mailing List

District

Shop

404 Union St.

MI 0037761

Line starting from the point of discharge
and extending 100 feet west of same
thence from the discharge.

Remission of Penalties

YEAR	OPTIONAL # NO	FIRE			Oil-Glass			Oil-Glass		
		AVG.	MAX	MIN	AVG.	MAX	MIN	AVG.	MAX	MIN
1979	100053	.57	.60	.47	5.3	6.0	4.0	3	3	0
1980	100053	.44	.64	.20	7.0	9.7	4.0			

TRACKING SHEET
(retain in permit development file)

MDNR, 1981a

COMPANY NAME Bronson Specinities Inc

LOCATION Bronson

No Environmental Impact Statement Necessary

Yes Statement of Basis or Fact Sheet included

Yes Critical Material listing reviewed (district)

Permit conditions will meet EPA Guidelines (Unit Chief)

Permit will meet EPA waiver requirements (Unit Chief)

Permit will Meet Water Quality Stds. (Reviewed by _____)

Permit will adequately address critical material concerns (Reviewed By _____)

Reviewed and concurrence to Public Notice _____

section chief

Proposed permit Sent to Permittee

Public Noticed / / Public Notice Expires / /

Comments to Public Notice addressed

WRC Summary prepared

Public Hearing requested / / Date Scheduled

Public Hearings comments addressed

File contains proof of publication

US Fish & Wildlife Service _____ Waivered _____ Comments addressed

Corp of Engineers _____ Waivered _____ Comments addressed

USEPA _____ Waivered _____ Comments addressed / / date of
respons

File Contains return receipt of permittee

WRC Approval Date / /

Recommend Issuance of Permit Date of Issuance / /

Comments:

Signed _____
unit chief

Date _____